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July 7, 2023

VIA ECF

Hon. Jesse M. Furman
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: Reuveni v. Unapologetic Foods, LLC
No. 22 CV 10930 (JMF)**

Dear Judge Furman:

We represent the Plaintiff in the above-referenced action. As detailed below, I write to respectfully request that the Court order Defendants to respond to Plaintiff's discovery requests and produce responsive documents.

On May 18, 2023, Plaintiff served Defendants with document requests and interrogatories.¹ Defendants' responses and production were due on June 20, 2023, a deadline that the undersigned noted in a May 31, 2023 email to Defendants' counsel. Defendants did not request an extension of the June 20 deadline. Nonetheless, to date Defendants have not provided discovery responses or produced any responsive documents. The undersigned contacted Defendants' counsel on June 26, June 27, and July 6 asking when Defendants would provide their outstanding discovery. On July 6, Defendants' counsel stated that he anticipated providing written responses and objections by the middle of next week, but he would not commit to a timeline for producing responsive documents other than stating that they would be produced on a rolling basis. As of this writing, Plaintiff has Defendants' representation the written responses will be served next week and no idea as to when Defendants intend to begin or complete production of all of their responsive documents. Accordingly, Plaintiff respectfully requests that the Court order Defendants (other than The Masalawala LLC) to provide their written responses and objections no later than July 14, 2023 and

¹ At that time, The Masalawala LLC was not yet a Defendant in this case. While some of the initial document requests were drafted to apply to The Masalawala LLC in anticipation of filing the Second Amended Complaint that added that entity as a Defendant, Plaintiff also served supplemental document requests and interrogatories on The Masalawala LLC on June 26, 2023. Plaintiff is amenable to receiving all of The Masalawala LLC's responses and document production, including to the initial document requests, on July 26, 2023.

produce their responsive documents by July 21, 2023. The requested document production deadline is more than a month later than the deadline provided in Fed. R. Civ. P. 34(b)(2)(A).

We thank the Court for its attention to this matter.

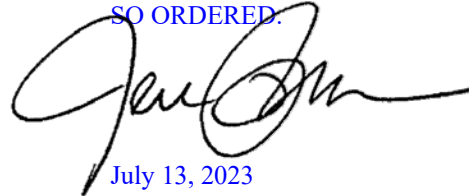
Respectfully submitted,

/s/Denise A. Schulman
Denise A. Schulman

cc: All counsel (via ECF)

In light of Defendants' response, *see* ECF No. 42, the Court declines to intervene at this time and Plaintiff's motion is denied. Further, Defendants are granted an extension to complete their response to Plaintiff's discovery requests, but - in view of the time that has passed - only until July 31, 2023. The Court hopes and expects that counsel will do better going forward to work professionally and in good faith to resolve any issues and that these kinds of disputes will not recur. The Clerk of Court is directed to terminate ECF No. 41.

SO ORDERED.

A handwritten signature in black ink, appearing to read "J. M. Jones", is written over the typed name "J. M. Jones".

July 13, 2023